

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF GEORGIA**

CATHERINE SMITH, AN INDIVIDUAL;  
DWIGHT SMITH, AN INDIVIDUAL.  
BRYANT SMITH, AN INDIVIDUAL.

PLAINTIFFS,

VS.

FULTON COUNTY, A COUNTY IN THE STATE  
OF GEORGIA

SUPERIOR COURT OF FULTON COUNTY,  
FAMILY DIVISION

MAGISTRATE COURT OF FULTON COUNTY

COBB COUNTY, A COUNTY IN THE STATE OF  
GEORGIA

MAGISTRATE COURT OF COBB COUNTY

JASLOVELIN LALL,  
ALEXANDRA MANNING,  
SCOTT KAYE,  
TODD ASHLEY,  
JANNE MCKAMEY  
JUDGE ASHLEY OSBY

DEFENDANT(S).

CASE NO.:

JURY TRIAL DEMAND

**1:22-CV-2471**

**COMPLAINT**

COME NOW the Plaintiffs and for their complaint against Judge Jaslovelin Lall,  
Judge Alexandra Manning, Judge Scott Kaye, Judge Todd Ashley, Judge Janne McKamey and  
Judge Ashley Osby for their willful misconduct in office and deprivation or rights set forth below.

**JURISDICTION**

The district court has jurisdiction of the case pursuant to 42 U.S.C. § 1983 of the Civil Rights Act of 1871, 18 U.S.C. § 242, and 42 U.S.C. § 14141. The district court's federal question jurisdiction is based on the violation of Plaintiff's Fourth, and Fourteenth Amendments to the United States Constitution. The district court has supplemental Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367. The amount of the controversy To Be Determined by Trial.

**PARTIES**

Plaintiff Catherine Smith is an individual who is a resident of City of Johns Creek-Duluth, Fulton County, State of Georgia.

Plaintiff Dwight Smith is an individual who is a resident of City of Johns Creek-Duluth, Fulton County, State of Georgia.

Plaintiff Bryant Smith is an individual who is a resident of City of Johns Creek-Duluth, Fulton County, State of Georgia.

At all times relevant herein, Defendant Fulton County is a municipality in the State of Georgia.

At all times relevant herein, Defendant Cobb County is a municipality in the State of Georgia.

At all times plead herein, Fulton County was the governing agency governing for Magistrate Court of Fulton County and was acting under the color of state law and in the course and scope of its duties.

At all times plead herein, Fulton County was the governing agency governing for Superior Court of Fulton County, Family Division and was acting under the color of state law and in the course and scope of its duties.

37 At all times plead herein, Cobb County was the governing agency governing for Magistrate  
38 Court of Cobb County and was acting under the color of state law and in the course and scope of  
39 its duties.

40 At all times herein, JASLOVELIN LALL is a Judge in Fulton County, Georgia. At all  
41 times pertinent to these charges, Judge Lall was subject to the Canons and Rules of the Code of  
42 Judicial Conduct and the laws of the State of Georgia.

43 At all times herein, ALEXANDRA MANNING is a Judge in Fulton County, Georgia. At  
44 all times pertinent to these charges, Judge Manning was subject to the Canons and Rules of the  
45 Code of Judicial Conduct and the laws of the State of Georgia.

46 At all times herein, SCOTT KAYE is a Judge in Fulton County, Georgia. At all times  
47 pertinent to these charges, Judge Kaye was subject to the Canons and Rules of the Code of Judicial  
48 Conduct and the laws of the State of Georgia.

49 At all times herein, TODD ASHLEY is a Judge in Fulton County, Georgia. At all  
50 times pertinent to these charges, Judge Ashley was subject to the Canons and Rules of the Code  
51 of Judicial Conduct and the laws of the State of Georgia.

52 At all times herein, ASHLEY OSBY is a Judge in Fulton County, Georgia. At all  
53 times pertinent to these charges, Judge Osby was subject to the Canons and Rules of the Code of  
54 Judicial Conduct and the laws of the State of Georgia.

55 At all times herein, JANNE MCKAMEY is a Judge in Cobb County, Georgia. At all times  
56 pertinent to these charges, Judge McKamey was subject to the Canons and Rules of the Code of  
57 Judicial Conduct and the laws of the State of Georgia.

**BACKGROUND**

Judge Jaslovelin Lall made legal arguments to obtain the restraining order before another Fulton County Judge Alexandra Manning which is a Unfair Trial and Conflict of Interest in which the restraining orders were used to convince America Homes 4 Rent to file for eviction, knowing it would cause the eviction. Judge Lall convinced multiple City of Johns Creek Police Officers to open an investigation, and convinced Fulton County Marshal to mingle in a private matter. Judge Lall made complaints directly with Melissa Smith, leasing manager of Plaintiffs' landlord, America Home 4 Rent as "attorney for the neighbors and family members." Judge Jaslovelin Lall has been building an eviction case against the Plaintiffs using her title and authority as a Fulton County Judge who wantonly and blatantly conspired, led and acted with bias, disregard for Plaintiffs' civil liberties, and has caused Plaintiffs' extreme emotional and monetary damages.

Judge Jaslovelin Lall argued the restraining order for the neighbors and family members based on Fulton County Courts litigation tactics before Judge Alexandra Manning.

Defendant judges, and all of them, knew or should have known of the conflict of interest, bias, ethical and official misconduct, and more as further explained herein.

At all times relevant herein, Plaintiffs attest with information and belief, legal help from Jaslovelin Lall fueled her family to act along with neighbors and family members, resulting in over 29 court cases and over 30 police calls to the City of Johns Creek Police Department.

At All times relevant herein, Plaintiff Catherine Smith made over 30 police calls on Jaslovelin family and Neighbors threats, harassment, stalking, surveillance, disturbances, violation of peaceful living, and other things.

At All times relevant, there have been over 29 cases in Magistrate Court of Fulton County, Superior Court of Fulton County, and Northern District of Georgia in which the Plaintiff Catherine

Smith have been involved.

At All times relevant, Repeated legal actions brought to Fulton County has only resulted in one sided favorable result due to the influence of Jaslovelin Lall direct or indirect.

Repeated interference, tampering with evidence, and influence on other Judges indirect or directed have led to Plaintiff Catherine Smith denial of rights.

Any action brought forward in Fulton County State Court has resulted in instant bias, prejudice against the Plaintiff Catherine Smith.

Plaintiffs have suffered humiliation and frustration over Fulton County Court biased and lack of due process.

The absence of Due process, bias, conspiracy, and fraudulent scheme is shocking, disparaging, despicable and disgraceful. No ordinary individual should endure this type of Justice.

**Relevant Cases:**

**Warrant Cases:**

1.Catherine Smith vs. Judge Jaslovelin Lall – Case # 21MAGC-02697, 2. Catherine Smith vs. Mandeep Rajhans– Case # 21MAGC-02673

3.Delvin Rajhans vs. Catherine Smith– Case # 21MAGC-02740

4.Mandeep Rajhans vs. Catherine Smith– Case # 21MAGC-02737

5.Bradley Paul vs. Catherine Smith– Case # 21MAGC-02738

6.Candi Paul vs. Catherine Smith– Case # 21MAGC-02739

Restraining Order Cases Dismissed by Judge Scott Kaye (works with Judge Jaslovelin Lall

**Fulton County Superior Court**

7.Catherine Smith vs. Judge Jaslovelin Case # 2021CV351070

8.Catherine Smith vs. Rohan Lall Case # 2021CV351073

9.Catherine Smith vs. Bianca Lall Case # 2021CV351068

10.Catherine Smith vs. Sanjay Lall Case # 2021CV351069

11.Catherine Smith vs. Mandeep Rajhans Case # 2021CV351080

12.Catherine Smith vs. Delvin Rajhans Case # 2021CV351067

13.Catherine Smith vs. Sukhmeet Rajhans Case # 2021CV351074

Cases – 01/28/2021- Restraining order cases ruled on by Judge Alexandra Manning (Who works with Judge Jaslovelin Lall in Fulton County Superior Courts)

15.Candi Paul vs. Catherine Smith – Case #2021CV344598

16.Bradley Paul vs. Catherine Smith - Case #2021CV344599

17.Mandeep Rajhans vs. Catherine Smith – Case #2021CV344179

18.Delvin Rajhans vs. Catherine Smith – Case #2021CV344180

**Other Open Cases**

- 19.State of Ga. Vs. Catherine Smith, Fulton County Animal Control Case #2016-EX-01108.
- 20.Catherine Smith vs. Judge Scott Kay, filed in Fulton County Magistrate Court Case# 21MS161324.
- 21.Catherine Smith vs. Judge Alexandra Manning, filed in Fulton County Magistrate Court Case# 22MS161407
- 22.Catherine Smith vs. Judge Janne Mackemy, filed in Cobb County Magistrate Court Case# 21-J-11058
- 23.America Homes for Rent vs. Catherine Smith, Dwight Smith, Bryant Smith, Eviction Case # 21ED180660, removed to Federal Court Case Number:
24. Dwight Smith, Catherine Smith, Bryant Smith vs. American Homes for Rent Case Number, Northern District of Georgia Atlanta Division
25. Delvin Rajhans vs. Catherine Smith, filed in Fulton County Magistrate
26. Mandeep Rajhans vs. Catherin Smith, filed in Fulton County Magistrate
- 27.Smith et al vs. AMH 2014-1 Borrower, LLC et al vs : Case Number 1:22-CV-0805-SEG-JSA
28. AMH 2014-1 Borrower, LLC ISAOA vs. Smith et al - Case Number 1:22-cv-00536
29. Smith et al v. City of Johns Creek Police Department et al

**FACTS**

**January 2021**

1. In January 2021, Judge Jaslovelin Lall argued a restraining order before another Fulton County Judge Alexandra Manning, on behalf of her family members, Delvin Rajhans and Mandeep Rajhans and close friend Candi Paul and Bradley Paul. Judge Manning knew or should have known of this conflict of interest and violation of judicial ethics, Georgia Professional Conduct, Georgia and Federal Law identified herein.

2. This Restraining Order has since been used to harass the Petitioners with false accusations of breaking said Restraining Order. As a matter of fact, the restraining order was delivered to Plaintiffs' landlords.

3. In an email dated March 9, 2021 - Gabrielle Epsy, O'kelley & Sorohan, stated, "As seen attached, a Fulton County Superior Court judge entered protective orders and found that a

tenant in 480 Leasingham Way “knowingly and willfully violated O.C.G.A. § 16-5-90 *et seq.*” As a matter of fact, Plaintiff Catherine Smith has only to drive into her driveway and heads toward her house, when she is immediately and despicably harassed by her neighbors. Moreover, it is the neighbors who have set up surveillance on the Plaintiffs and their home. At all times herein it was, in fact, others who knowingly and willfully violated O.C.G.A. § 16-5-90 *et seq.* at all times herein instigating all conflicts against the Plaintiffs.

4. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of the Defendant Judges’ conduct.

**April 2021**

5. April 20, 2021, Judge Jaslovelin Lall called City of Johns Creek Police Department to state Plaintiffs had violated the restraining order by citing her position and authority as attorney and judge to convince City of Johns Creek Police Officer Bradley Rosenquist to open an investigation. A Formal Investigation was done by Detective Caldwell, City of Johns Creek Police Department.

6. Judge Jaslovelin Lall also stated to Police Officer Bradley Rosenquist that she called the Fulton County Marshals on a private matter involving Plaintiff Catherine Smith, filed complaints with America Homes 4 Rent, and was now vigorously pursuing false misdemeanor violation on a private citizen.

**APRIL 20, 2021:**

**JUDGE & ATTORNEY JASLOVELIN LALL CALLS CITY OF JOHNS CREEK  
POLICE DEPARTMENT TO ALLEDGE CATHERINE SMITH VIOLATED THE  
RESTRAINING ORDER**

Conversation in Part from Body Cam Records City of Johns Creek Police



Department 4/20/2021 wherein Police Officer Bradley Rosenquist responded around 4 pm:

**JUDGE JASLOVELIN LALL:** "I called I'm Jaslovelin. I'm sister, and attorney. I was the one who obtained the TPO for that family and this family against Catherine Smith"

**POLICE OFFICER BRADLEY ROSENQUIST:** "I'm just saying the house is not 20 yards." [The properties of Plaintiff and MONDEEP Rajhans are adjacent properties] ".....We can definitely look into this TPO to see where 20 yards is in the play with this"

**POLICE OFFICER BRADLEY ROSENQUIST** "I mean petitioner and or petitioners immediate family place of employment or school 20 yards, within 200 yards of the petitioner will at the residence. "So, I mean, I just don't see how, how that even just the gap alone, if the person comes out and drives .....here, they're violating you know, we are not in the residence at that point."

**JUDGE JASLOVELIN LALL:** "But the thing is within the confines of the properties we never objected. But this time she stood; she just parked the car right in front of us watching us. That's the part that made me call you. "

**JUDGE JASLOVELIN LALL:** "I was the one who made the argument before the judge."

"I'm a judge with Fulton County."

"I do these warrants in these cases all the time. We have issued warrants on even less circumstances." ..... this is at the most a misdemeanor violation of a TPO..."

**JUDGE JASLOVELIN LALL:** "So my concern is that every report that we've seen on God's Creek indicates that she's mentally unbalanced."

**JUDGE JASLOVELIN LALL:** "...But the point was, the TPOs began when my mom a senior citizen was leaving for work and her husband, and she ambushed my mom right in front of her here on video. And that's when I took it to Superior Court and got the TPOs..... I helped them get a TPO as well."

" I reported all this to her landlord [America Homes 4 Rent]..... and now they have an eviction case pending against them. "Okay, so we were hoping that they would leave the property once the landlord gave the notice to leave, but they're fighting it that too."

**JUDGE JASLOVELIN LALL:** "Now, they filed an answer and everything

**JUDGE JASLOVELIN LALL** "Now they have six cases in the Fulton County Court in just this year alone"

**JUDGE JASLOVELIN LALL** "This has been going on since last June..."



**JUDGE JASLOVELIN LALL:** "But this is a misdemeanor violation where she knows, we are standing here talking on our own property that she purposely parked her car within ....20 yard." "This is my video if you want to see it. It's not that long"

**POLICE OFFICER BRADLEY ROSENQUIST:** "I'll just let you save it and give it to the detective.. we'll write it up. And when we write up the report, the report will go over to an investigatory unit, that unit will then either a contact you guys...." "They'll do a follow up based off what we write in the report in the narrative, and you guys can give your sides like verbally to them. And then they can reach out make contact with her as well. What exactly was going on?"

7. Judge Jaslovelin Lall used her title and authority as Judge and Attorney to build an eviction case against the Plaintiffs through a sequence of actions and fully engaged in a conflict of interest and in violation of the Georgia and Federal Statutes listed in this cause of action. Furthermore.

#### **May 2021**

8. About 10 days later, May 10, 2021, Plaintiff Dwight Smith, met with Detective Derrick Caldwell, to review the incident, wherein Detective Caldwell was shown a video Plaintiff Dwight Smith captured showing Judge Jaslovelin Lall aggressively approaching the Plaintiffs. Detective Derrick Caldwell "here's my issue "The problem that I have is and it's really not my decision to make, what will happen is I will write up my findings and present it to Fulton County Magistrate Judge, the judge review it neither say yes, she violated this temporary protective order." Or no she didn't...."

9. Detective Derrick Caldwell confirmed the Magistrate Judge did not see find any violations of the temporary protective order.

10. Due to the ongoing corruption and willful interference of Judge Lall, the Plaintiffs knew they would not get any relief or justice from this continual harassment.

11. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of Defendant Judge's conduct.

**June 2021**

**Criminal Warrants Filed Against Judge Jaslovelin Lall and Mandeep Rajhans, her sister**

12. Seeking relief from the harassment and stalking, Petitioner Catherine Smith filed a criminal warrant against Judge Jaslovelin Lall. Two days later, Judge Lall's family members Delvin Rajhans and Mandeep Rajhans and close friends (neighbors) Bradley Paul and Candi Paul filed criminal warrants against Plaintiff Catherine Smith.

13. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of Defendant Judges' conduct.

**July 2021**

**Restraining Order Case Filed against Judge Jaslovelin Lall and 7 Family Members**

14. Defendant Judge Scott Kaye denies Plaintiff Catherine Smith's restraining order against Judge Jaslovelin Lall and 7 her family members. The Restraining Order was Heard and Denied [Jaslovelin Lall, Sanjay Lall (Judge Lall's Husband), Bianca Lall (Judge Lall's Daughter), Rohan Lall (Judge Lall's Son), Mandeep Rajhans (Judge Lall's Sister), Delvin Rajhans (Judge Lall's brother-in-law), Sukhmeet Rajhans (Judge Lall's Mother). Judge Kaye knew or should have known of this conflict of interest and violation of judicial ethics, Georgia Professional Conduct, Georgia and Federal Law identified herein.

15. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of Defendant Judges' conduct.

**November 2021**

**Warrant Hearing Against Judge Jaslovelin Lall**

271  
272 16. Plaintiff Catherine Smith informed Judge Janne Mckamey she did not receive any  
273 correspondence from the court until about 9 days prior to the hearing. Judge Mckamey alleged  
274 there was plenty of time since the cases were filed. There was a total of 5 cases in which 2 of the  
275 cases were filed by Plaintiff Catherine Smith on June 22, 2021. The other 3 cases were unknown  
276 to the Plaintiff Catherine Smith because they were filed by others who Judge Jaslovelin Lall argued  
277 for during the restraining order hearing on January 28, 2021, which was deemed to be a conflict  
278 of interest with Fulton County Superior Family Courts.

279 17. Plaintiff Catherine Smith asked for more time to secure an attorney. Judge McKamey  
280 forcibly proceeded with the hearings and denied her Request. Judge McKamey knew or should  
281 have known of this unfair trial, conflict of interest and violation of judicial ethics, Georgia  
282 Professional Conduct, Georgia and Federal Law identified herein.

283 18. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of  
284 Defendant Judges' conduct.

285  
286 **December 2021**

287 **Catherine Smith filed Cases Against Judge Scott Kaye and Judge Alexandra Manning**  
288

289 19. Catherine Smith filed cases against Judge Scott Kaye and Judge Alexandra Manning  
290 for failing to recuse themselves and denying her a fair trial. The cases are pending in Magistrate  
291 Court of Fulton County.

292 20. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of  
293 Defendant Judges' conduct.

294 **January 4, 2022,**

295 **Compliance Restraining Order Hearing with Mandeep Rajhans and Delvin Rajhans Judge**  
296 **Jaslovelin Lall Family Members**

297  
298           28. Judge Ashley Osby filled in for Judge Scott Kaye, she stated he recused himself from  
299 the hearing due to a pending case against him, *Catherine Smith vs. Judge Scott Kaye* in the  
300 Magistrate Court of Fulton County.

301           29. Judge Osby stated she spoke with Judge Scott Kaye and conducted the hearing despite  
302 the case being filed against Superior Court of Fulton County and Judge Scott Kaye. An obvious  
303 ethic violation. Judge Osby knew or should have known of this unfair trial, conflict of interest and  
304 violation of judicial ethics, Georgia Professional Conduct, Georgia and Federal Law identified  
305 herein.

306           30. Due to conflicting times issued by the court, Catherine Smith missed the restraining  
307 order hearing at 9 AM, but was able to speak with Judge Osby briefly around 10:30 am, in which  
308 she stated she would rule without hearing Catherine Smith's side.

309           31. Judge Osby issued a more restrictive order in which alleged the restraining order was  
310 broken, issued a psychiatric evaluation, and other restrictive measures. Judge Osby, knew about  
311 the pending eviction case.

312           32. Plaintiff Catherine Smith, upon information and belief, alleges the charges issued by  
313 Judge Osby would damage the Plaintiff Catherine Smith during the eviction hearing scheduled for  
314 Feb. 22, 2022. Plaintiff Catherine Smith, upon information and belief, allege Judge Osby was  
315 prejudicial and biased, who then retaliated against Plaintiff Catherine Smith after she reviewed the  
316 cases filed against Judge Scott Kaye and Alexandra Manning. She reviewed them while on the  
317 Zoom Call with the Plaintiff Catherine Smith.

318 33. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of  
319 Defendant Judge's conduct.

320 **February 22, 2022 – Fulton County Magistrate Court Eviction Hearing**

321 34. The day before the restraining order hearing, Judge Jaslovelin Lall met openly with  
322 her family members and friends in front of the Plaintiffs' home. The following day, the family  
323 members Mandeep Rajhans, Bianca Lall and a neighbor Bradley Paul appeared at the hearing via  
324 Zoom to testify. Judge Jaslovelin Lall's family members and close friends showed up to influence  
325 the Eviction hearing to testify against the Plaintiff Catherine Smith and her family.

326 35. In February, out of fear of bias and fraud in Fulton County Courts. Plaintiff Catherine  
327 Smith filed a Notice of Removal for the eviction hearing, to remove the pending Eviction Case to  
328 the Northern District of Georgia (Federal Court).

329 36. The presiding Judge ordered the transfer of the case.

330 **February 22 through February 25, 2022 – Catherine Smith files Motion to Move**  
331 **Restraining Order to Another Jurisdiction**  
332

333 37. Multiple Emails were sent to the Superior Court of Fulton County addressed to Angela  
334 Taylor, Nayeli Delibrado and Sasha Brown regarding unethical behavior, conflict of interest,  
335 fraudulent schemes along with evidence against Judge Jaslovelin Lall and Fulton County court  
336 Judges listed herein.

337 38. Plaintiffs have, and presented evidence, including multiple police body cams which  
338 showed wide evidence of tampering and trying to influence the City of Johns Creek Police  
339 Department and Fulton County Courts by Judge Lall.

340 39. A docketed court Motion to Transfer the cases the restraining order cases of Judge  
341 Jaslovelin Lall family members from the Superior Court of Fulton County to another Jurisdiction.  
342 The following were notified and copied on the email Angela Taylor, Nayeli Delibrado, and Sasha  
343 Brown.

344 40. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of  
345 Defendant Judges' conduct.

346 **March 1, 2022, Compliance Hearing Restraining Order Hearing**

347 41. A restraining order compliance hearing was scheduled by Judge Ashley Osby. The  
348 restraining order hearing was secured and required a password.

349 42. Judge Jaslovelin Lall was not a party to the restraining order but appeared by zoom  
350 and compromised the security of the hearing.

351 43. Catherine Smith asked Judge Ashley Osby as to why Judge Jaslovelin Lall was at the  
352 hearing. Judge Ashley Osby falsely stated the restraining order hearing was public and anyone  
353 could access the hearing. The hearing was not public. A password was required.

354 44. There was an obvious breach of **Confidential Medical Information**, via no security  
355 measures to protect the Plaintiff Catherine Smith from abuse and Judge Ashley Osby covered for  
356 Judge Jaslovelin Lall fraudulent actions.

357 45. Judge Ashly Osby willfully participated in the harassment.

358 46. Plaintiff Catherine Smith further asked Judge Ashley Osby what evidence she used to

rule on the case on January 4, 2022, to require Psychiatric Evaluation and state the restraining order had been broken. **Judge Osby stated she ruled on the hearing based on verbal testimony alone and no evidence was presented.**

47. At the conclusion of the restraining order hearing. Judge Osby stated she would issue the order to remove the compliance restriction of psychiatric evaluation and issue an order for attachment for the motion to move the restraining order to another jurisdiction.

48. Following the restraining order hearing, Judge Osby failed to issue any order regarding moving the restraining order to another Jurisdiction in an attempt to conceal and deny her the rights to move the restraining order to another jurisdiction in favor of Judge Lall's wishes.

**Due process was denied by Judge Osby failure to process the Motion to Move the Restraining Order to another Jurisdiction. Court Clerk Sasha Brown witnessed the harassment and abuse**

49. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of Defendant Judge's conduct.

**March 4, 2022**

50. Plaintiff Catherine Smith was served with a lawsuit from Judge Jaslovelin Lall's family members, filed in the Magistrate Court of Fulton County. The lawsuit was filed December 26, 2021.

51. Following the breach of security where Judge Jaslovelin Lall signed into the hearing, just two days later, the lawsuit was served on the Plaintiff Catherine Smith.

52. Plaintiff Catherine Smith immediately feared bias due to the past actions. Bias took



381 place again.

382 53. Plaintiffs have suffered extreme and severe emotional distress and pain as a result of  
383 Defendant Judge's conduct.

384 **May 1, 2022**

385 54. Plaintiff Catherine Smith filed an answer within the statutory time period. The entry  
386 was docketed. Plaintiff Catherine Smith went to the court in person to pay the court costs or any  
387 other cost associated with filing a counter claim within 45 days. The clerk Zadrian Miley told  
388 Plaintiff Dwight Smith that the presiding Judge would decide on the fees at trial. The balance  
389 showing owed was zero.

390 55. Plaintiff Catherine Smith accepted the clerk's answer was true and correct.

391 56. A few days later, Judge Jaslovelin Lall family members filed a motion for default.

392 57. The presiding Judge Todd Ashley struck the answer and counterclaim of the Plaintiff  
393 Catherine Smith and moved for default only in mediation.

394 58. Plaintiffs made another trip to the court. Plaintiff Dwight Smith talked to Clerk  
395 Zadrian Miley and Tiara Copper, his supervisor. Clerk Zadrian Miley and Tiara Copper were  
396 surprised by the strike of the answer and counterclaim.

397 59. Plaintiff Catherine Smith feared bias based on past experiences. Based on their  
398 response and information and belief, tampering took place.

399 60. Judge Todd Ashley had constructive or actual knowledge there were two pending cases

in the Magistrate Court of Fulton County: Catherine Smith vs. Judge Scott Kaye and Catherine Smith vs. Judge Alexandra Manning

61. Furthermore, The law is vague, the law does not state court costs. The law simply states costs.

62. When the law is vague, the Judge should have given the benefit of the doubt to the Plaintiff Catherine Smith or at least hold the hearing then render judgment.

63. Plaintiffs fear further retaliation from Magistrate Court of Fulton County.

64. Plaintiffs, and each of them, have suffered extreme and severe emotional distress and pain as a result of Defendant Judge's conduct.

### CONCLUSION

I. Defendant Judges, and each of them knew, or should have known of the unfair trial, conflict of interest and violation of judicial ethics, Georgia Professional Conduct, Georgia and Federal Laws identified herein.

Violations of the Georgia Code of Judicial Conduct support discipline when they amount to "willful misconduct in office," "willful and persistent failure to perform the duties of office," or "conduct prejudicial to the administration of justice which brings the judicial office into disrepute." Ga. Const. of 1983, Art. VI, Sec. VII, Par. VII (a); JQC Rule 6 (A) (1) and (5). The Defendant Judges, and all of them, have displayed conduct as alleged above of willful misconduct in office, a willful and persistent failure to perform the duties of office, and is prejudicial to the administration of justice, and have violated civil rights and liberties of the Plaintiffs and the

420 Georgia Constitution and its Statutes.

421 As a result of Defendants' conduct, and each of them, Plaintiffs are entitled to recover  
 422 against the individual Defendants, pursuant to, but limited to, (1) Ga. Code § 51-1-6 (2020)  
 423 Recovery of damages upon breach of legal duty, (2) Ga. Code § §16-10-24(a) when they  
 424 knowingly or willfully obstruct or hinder any law enforcement officer in the lawful discharge of  
 425 his official duties. The penalty for a misdemeanor conviction in Georgia is a fine up to \$1,000, jail  
 426 time up to one year, or both, (3) Ga. Code § 51-1-8 Right of action arising from breach of private  
 427 duty, (4) Ga. Code § 51-1-7 When infraction of public duty gives cause of action to individual. (5)  
 428 Ga. Code § 51-1-9. Recovery for torts to self, wife, child, ward, or servant, (6) Ga. Code § 51-1-  
 429 12, Liability for ratifying tort, and (7) Title VII of the US Constitution 15 U.S. Code § 6604.

430 As a result of Defendants' conduct, and each of them, Plaintiffs are entitled to recover  
 431 punitive damages against the individual Defendants pursuant to GA Code § 51-12-5.1 (2020): As  
 432 used in this Code section, the term "punitive damages" ... and other descriptions of additional  
 433 damages awarded because of aggravating circumstances in order to penalize, punish, or deter a  
 434 defendant.

#### 435 **DEFENDANTS' VIOLATIONS**

##### 436 **CAUSE OF ACTION 1 – AGAINST ALL DEFENDANTS** 437 **18 U.S.C. § 1503 Obstruction of Justice** 438

439 An act that "corruptly or by threats or force, or by any threatening letter or  
 440 communication, influences, obstructs, or impedes, or endeavors to influence, obstruct, or impede,  
 441 the due administration of justice."

##### 442 **CAUSE OF ACTION 2 – AGAINST JASLOVELIN LALL** 443 **O.C.G.A. §16-10-24(a) Obstruction of Justice**

When they knowingly or willfully obstruct or hinder any law enforcement officer in the lawful discharge of his official duties. The penalty for a misdemeanor conviction in Georgia is a fine up to \$1,000, jail time up to one year, or both.

**CAUSE OF ACTION 3– AGAINST ALL DEFENDANTS**  
**GA Code § 51-1-9. Recovery for torts to self, wife, child, ward, or servant.**

Every person may recover for torts committed to himself, his wife, his child, his ward, or his servant.

**CAUSE OF ACTION 4– AGAINST ALL DEFENDANTS**  
**GA Code § 51-1-12. Liability for ratifying tort.**

By ratification of a tort committed for his own benefit, the ratifier becomes as liable as if he had commanded that it be committed. A person ratifying a tort does not become liable, however, if the act was done for the benefit of a third person.

**CAUSE OF ACTION 5– AGAINST ALL DEFENDANTS**  
**Section 242 of Title 18**

It is a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States.

Section 52, which is concerned with the action of public officers, is as follows: “Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects, or causes to be subjected, any inhabitant of any State, Territory, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution and laws of the United States, ... by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined not more than \$1,000, or imprisoned not more than one year, or both.”

- United States v. Buntin, 10 Fed. 730 (S. D. Ohio, 1882); See also
- United States v. Stone, 188 Fed. 836 (D. Md. 1911). See also
- 15313 U. S. 299, 61 Sup. Ct. 1031 (1941). “The charge based on these allegations, was that the appellees conspired with each other and with others unknown, to injure and oppress citizens in the free exercise and enjoyment of rights and privileges secured to them by the Constitution and Laws of the United States.” See United States v. Saylor, 322 U. S.

385, 64 Sup. Ct. 1101 (1944), upholding further use of Section 51 in election cases. "Section 19 of the Criminal Code, which penalizes conspiracy "to injure, oppress, threaten, or intimidate any citizen in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States.

- *Screws v. United States*, 16256 U. S. 232, 41 Sup. Ct. 469 (1220). 17 Section 52 had been applied and upheld since 1939 in cases in the lower federal courts.
- *United States v. Sutherland*, 37 F. Supp. 344 (1940); "The indictment demurred to is in three counts, each alleging violation of the following Federal statute: "Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects, or causes to be subjected, any inhabitant of any State, Territory, or District to the deprivation of any rights, privileges, or 345\*345 immunities secured or protected by the Constitution and laws of the United States, or to different punishments, pains, or penalties, on account of such inhabitant being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined not more than \$1,000, or imprisoned not more than one year, or both." 18 U.S.C.A. § 52"
- *Culp v. United States*, 131 F. (2d) 93 (1942); "The appellants and others were indicted under § 88, 18 U.S.C.A.,[1] for having conspired to commit an offense defined in § 52, 18 U.S.C.A."
- *Catlette v. United States*, 132 F. (2d) 902 (1943).

**CAUSE OF ACTION 6– AGAINST ALL DEFENDANTS**  
**Criminal Interference with Right to Fair Housing, 42 U.S.C. § 3631**

This statute makes it a crime to use or threaten to use force to interfere with housing rights because of the victim's race, color, religion, sex, disability, familial status, or national origin.

**CAUSE OF ACTION 7– AGAINST ALL DEFENDANTS**  
**Violent Interference with Federally Protected Rights, 18 U.S.C. § 245**

This statute makes it a crime to use or threaten to use force to willfully interfere with a person's participation in a federally protected activity because of race, color, religion, or national origin. Federally protected activities include public education, employment, jury service, travel, or the enjoyment of public accommodations. Under this statute, it is also a crime to use or threaten to use force against those who are assisting and supporting others in participating in these federally protected activities.

517  
518 **CAUSE OF ACTION 8– AGAINST ALL DEFENDANTS**  
519 **Conspiracy Against Rights, 18 U.S.C. § 241**  
520

521 This statute makes it unlawful for two or more persons to conspire to injure, threaten, or  
522 intimidate a person in any state, territory, or district in the free exercise or enjoyment of any right  
523 or privilege secured to the individual by the U.S. Constitution or the laws of the U.S.

524  
525 **CAUSE OF ACTION 13– AGAINST ALL DEFENDANTS**  
526

527 **GEORGIA CONSTITUTION OF 1983**  
528 **(As Amended Through January 1, 2017)**  
529

530 **ARTICLE I. - BILL OF RIGHTS**  
531 **SECTION I. - RIGHTS OF PERSONS**  
532

533 **Paragraph I. Life, liberty, and property.**

534 No person shall be deprived of life, liberty, or property except by due process of law.

535 **Paragraph II. Protection to person and property; equal protection.**

536 Protection to person and property is the paramount duty of government and shall be  
537 impartial and complete. No person shall be denied the equal protection of the laws.

538  
539 **Paragraph VI. Libel**

540 In all civil or criminal actions for libel, the truth may be given in evidence; and, if it  
541 shall appear to the trier of fact that the matter charged as libelous is true, the party shall be  
542 discharged.

543 **Paragraph VII. Citizens, protection of**

544 All citizens of the United States, resident in this state, are hereby declared citizens of this  
545 state; and it shall be the duty of the General Assembly to enact such laws as will protect them in  
546 the full enjoyment of the rights, privileges, and immunities due to such citizenship.

547  
548 **Paragraph XII. Right to the courts.**

549 No person shall be deprived of the right to prosecute or defend, either in person or by  
550 an attorney, that person's own cause in any of the courts of this state.

551 **Paragraph XIII. Searches, seizures, and warrants.**

552 The right of the people to be secure in their persons, houses, papers, and effects against  
553 unreasonable searches and seizures shall not be violated; and no warrant shall issue except upon  
554 probable cause supported by oath or affirmation particularly describing the place or places to be  
555 searched and the persons or things to be seized.

556 **Paragraph XIV. Benefit of counsel; accusation; list of witnesses;**  
557 **compulsory process.**

558 Every person charged with an offense against the laws of this state shall have the privilege  
559 and benefit of counsel; shall be furnished with a copy of the accusation or indictment and, on  
560 demand, with a list of the witnesses on whose testimony such charge is founded; shall have  
561 compulsory process to obtain the testimony of that person's own witnesses; and shall be confronted  
562 with the witnesses testifying against such person.

563  
564 **CAUSE OF ACTION 9 – AGAINST ALL DEFENDANTS**  
565  
566 **FULTON COUNTY CODE OF ETHICS**  
567 **CONFLICT OF INTEREST: PROHIBITED TRANSACTIONS**  
568

569 220. Defendants, As a matter of fact, they knowingly violated their own Fulton  
570 County Code of Ethics Sec. 2-66(a), (b), (c) and (h):

- 571 (a) It is essential to the proper government and administration of Fulton County  
572 that members of the board of commissioners, as well as all other officers and  
573 employees of the county, are in fact and in appearance, independent and  
574 impartial in the performance of their official duties; that public service not be



used for private gain; and that there be public confidence in the integrity of the county. Because the attainment of one or more of these ends is impaired whenever there exists in fact, or appears to exist, a conflict between the private interests and public responsibilities of county officers and employees, the public interest requires that the county protect against such conflicts of interest by establishing appropriate ethical standards of conduct. It is also essential to the efficient operation of the county that those persons best qualified be encouraged to serve in positions of public trust. Accordingly, the standards hereinafter set forth must be so interpreted and understood as not to unreasonably frustrate or impede the desire or inclination to seek and serve in public office by those persons best qualified to serve. To that end, no officer or employee of the county, except as otherwise provided by law, should be denied the opportunity available to all other citizens to acquire and maintain private, economic, and other interests, except where a conflict of interest situation would necessarily result. The policy and purpose of this code of ethics, therefore, is to make clear those standards of ethical conduct that shall be applicable to the persons hereinabove named in the discharge of their official duties; to implement the objective of protecting the integrity of the county's government; and to prescribe only such essential restrictions against conflicts of interest as will not impose unnecessary barriers against public service.

- (b) Officers and employees should aspire to avoid even the appearance of a conflict of interest by avoiding conduct or circumstances that would provide a reasonable basis for the impression that the officer's or employee's ability to protect the public interest or impartially perform an official act is compromised by his or her financial or personal interests in the matter or transaction. The appearance of a conflict of interest can exist even in the absence of an actual conflict of interest.
- (c) Officers and employees should aspire to avoid even the appearance of impropriety by avoiding conduct or circumstances that would provide a reasonable basis for the impression that a person can improperly influence or unduly enjoy the officer's or employee's favor in the performance of his or her official acts or actions. The appearance of impropriety can exist even in the absence of actual impropriety...
- (h) Intent to influence means to deliberately and willfully act in a manner chosen and designed to exert power over others, or to modify or affect the actions of others, even if in a gentle, subtle, or gradual fashion.

**PRAYER FOR RELIEF**

**REQUEST FOR RELIEF**

A. Plaintiff incorporates the preceding paragraphs by reference herein.

B. WHEREFORE, Plaintiff seeks the following relief:

C. Actual and compensatory damages sufficient to make him whole to be determined at trial by Jury.

D. Punitive damages against Defendants sufficient to punish them and to deter further wrongdoing.

F. Injunctive relief sufficient to protect Plaintiff and his family from the ongoing harassment and intimidation of Defendants.

G. Plaintiffs assert the rights at any time to request to obtain an Attorney and ask for Attorneys' fees, litigation expenses, costs, pre- and post-judgment interest as provided by law; and

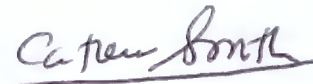
H. Such other and further relief as the Court deems just and proper.

**CATHERINE SMITH, PRO SE**

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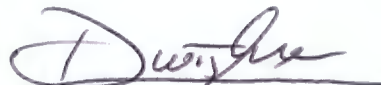
**Signature**

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